

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 E. 42nd Street, Suite 2020
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

ctucker@faillacelaw.com

July 1, 2020

VIA ECF

Honorable Alvin K. Hellerstein
Daniel Patrick Moynihan
United States Courthouse
Courtroom: 14D
500 Pearl St.
New York, NY 10007-1312

Re: Franco Perez et al v. Super Gourmet Food Corp. et al
1:16-cv-04375-AKH

Your Honor,

This firm represents Plaintiffs in the above-referenced matter. We write jointly with Defendants to respectfully request an extension of time to complete discovery.

Unfortunately, due to the COVID-19 restrictions, the parties were unable to take in-person depositions. Counsels are proposing remote depositions and are in the process of scheduling them. Plaintiffs' counsel recommends remote depositions. This is the first request for an extension of the discovery deadline and all parties consent to the proposed extension.

The parties respectfully request that the deadline for completion of discovery be extended to October 26, 2020.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Clifford R. Tucker

Clifford R. Tucker

MICHAEL FAILLACE & ASSOCIATES, P.C.

Attorneys for the Plaintiffs

Cc: Via ECF

Netanel Newberger
Milman Labuda Law Group, PLLC
3000 Marcus Avenue
Suite 3W8
New Hyde Park, NY 11042

516-328-8899

Fax: 516-328-0082

Email: shwarma1@hotmail.com

Emanuel Kataev

Milman Labuda Law Group, PLLC

3000 Marcus Avenue

Suite 3W8

New Hyde Park, NY 11042

516-328-8899

Fax: 516-328-0082

Email: emanuel@mllaborlaw.com

Richard I Milman

Milman Labuda Law Group PLLC

3000 Marcus Ave.

Lake Success, NY 11042

(516)328-8899

Fax: (516) 328-0082

Email: rich@mmmlaborlaw.com